

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:

Silgan Containers Corporation
Facility #B0631

Facility Address:

2048 Williams Street
San Leandro, CA 94577

Mailing Address:

21800 Oxnard Street, Suite 600
Woodland Hills, CA 91367

Responsible Official

Gerald T. Wojdon,
Executive Vice President of Operations
818-710-3704

Facility Contact

Paul Brooking
Plant Manager
510-667-1078

Type of Facility: Metal Can Coating and
Manufacturing

Primary SIC: 3411

Product: Three-piece metal cans

BAAQMD Permit Division Contact:
Karen Dzienkowski

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed _____

Ellen Garvey, Executive Officer/Air Pollution Control Officer

11-1-99 _____

Date

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 10/7/98);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 10/7/98); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on November 1, 1999, and expires on October 31, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2004 and no earlier than October 31, 2003. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after October 31, 2004.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)

I. Standard Condition

4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

I. Standard Condition

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be November 1, 1999 to April 30, 2000. The report shall be submitted by May 31, 2000. Subsequent reports shall be for the following periods: May 1st through October 31st and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

I. Standard Condition

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
S-38	Roller Coater, Line 6	Wagner	12-15 inches	
S-39	Roller Coater, Line 5	Wagner	12-15 inches	
S-125	Litho Press, Line 7	Hoe	2 color	
S-126	Litho Press, Line 8	Hoe	4 color	
S-127	Litho Varnish Coater, Line 8	Wagner	12 inches	
S-128	Litho Oven, Line 8	Ross, natural gas	99 feet	Disabled burners
S-160	Coater Oven, Line 6	Wagner, natural gas	148 feet	0.1 MMBtu/hr
S-161	Coater Oven, Line 5	Wagner, natural gas	148 feet	0.1 MMBtu/hr
S-162	Litho Varnish Coater, Line 7	Wagner	12 inches	
S-163	Litho Oven, Line 7	Wagner, natural gas	102 feet	Disabled burners
S-164	End Seam Storage Tank	Fixed Roof		7800 gallons

II. Equipment

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-5	Thermal Oxidizer, Direct Flame, 22.4 MMBtu/hr	S-39 & S-161	BAAQMD Condition 3983.1 and 3983.2	1350 °F minimum temperature	98.5% _{wt} destruction efficiency or < 10 ppmv C1 in exhaust
A-6	Thermal Oxidizer, Direct Flame, 22.2 MMBtu/hr	S-38 & S-160	BAAQMD Condition 3983.1, 3983.2 and 3983.3	1350 °F minimum temperature	98.5% _{wt} destruction efficiency or < 10 ppmv C1 in exhaust
A-7	Thermal Oxidizer, Canco Direct Flame, 22.2 MMBtu/hr	S-125, S-162 & S-163	BAAQMD Condition 2963.7, 2963.8 and 2963.9	1350 °F minimum temperature	97.5% _{wt} destruction efficiency or < 10 ppmv C1 in exhaust
A-8	Thermal Oxidizer, Canco Direct Flame, 22.2 MMBtu/hr	S-126, S-127 & S-128	BAAQMD Condition 2963.7, 2963.8 and 2963.9	1350 °F minimum temperature	97.5% _{wt} destruction efficiency or < 10 ppmv C1 in exhaust

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

Where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 5	Open Burning (11/2/94)	Y
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. Additionally, where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S-38, COATER, LINE 6
S-39, COATER, LINE 5
S-160, COATER OVEN, LINE 2
S-161, COATER OVEN, LINE 3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 11	Metal Container, Closure and Coil Coating (12/20/95)		
8-11-301	Metal Container or Closure Coating Limitations	Y	
8-11-301.1	VOC Limit - Sheet Basecoat and Overvarnish	Y	
8-11-302	Emission Control Device Limitation for Metal Container or Closure Coatings	Y	
8-11-305	Alternate Emission Control Plan (optional)	Y	
8-11-306	Surface Preparation and Cleanup Solvent	Y	
8-11-402	Operation and Maintenance Plan	Y	

IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S-38, COATER, LINE 2
S-39, COATER, LINE 3
S-160, COATER OVEN, LINE 2
S-161, COATER OVEN, LINE 3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-11-403	Compliance Schedule	Y	
8-11-501	Coating Records	Y	
8-11-504	Afterburner Temperature, Monitoring	Y	
BAAQMD Condition # 3983			
part 1	Destruction Efficiency Requirement (basis: Cumulative Increase, BACT)	Y	
part 2	Minimum Temperature Requirement (basis: Cumulative Increase, BACT, Regulation 8-11-302)	Y	
part 3	Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	
part 4	Temperature Excursion Records (basis: Regulation 2-1-403)	Y	
part 5	Temperature Excursion Definition (basis: Regulation 2-1-403)	Y	
part 6	Intake Flow Velocity Requirement (basis: Cumulative Increase, BACT)	Y	
part 7	Records, Temperature Monitoring Data (basis: BAAQMD Regulations 2-6-501 and 8-11-504)	Y	
part 8	Alternative Compliance Provision (basis: BAAQMD Regulations 8-11-301, 8-11-302 and 8-11-305)		
part 9	Records, Coating and Solvent Usage	Y	
part 9 a)	coating information (basis: BAAQMD Regulation 8-11-501.1)	Y	
part 9 b)	daily usage records (basis: BAAQMD Regulation 8-11-501.2)	Y	
part 9 c)	cleanup solvent information (basis: BAAQMD Regulation 8-11-501.3)	Y	
part 9 d)	monthly totals of daily quantities (basis: BAAQMD Regulation 8-11-501.4)	Y	
part 9 e)	Annual usage and emissions summary (basis: BAAQMD Regulation 2-6-501)	Y	
part 10	Annual source test (basis: Cumulative Increase, BACT,	Y	

IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S-38, COATER, LINE 2
S-39, COATER, LINE 3
S-160, COATER OVEN, LINE 2
S-161, COATER OVEN, LINE 3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
	Regulation 8-11-302)		

IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S-125, LITHO PRESS, LINE 7
S-126, LITHO PRESS, LINE 8
S-127, VARNISH COATER, LINE 8
S-128, OVEN, LINE 8
S-162, VARNISH COATER, LINE 7
S-163, OVEN, LINE 7

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 11	Metal Container, Closure and Coil Coating (12/20/95)		
8-11-301	Metal Container or Closure Coating Limitations	Y	
8-11-301.1	VOC Limit – Sheet Basecoat and Overvarnish	Y	
8-11-301.10	VOC Limit – Inks	N	
8-11-302	Emission Control Device Limitation for Metal Container or Closure Coatings	Y	
8-11-305	Alternate Emission Control Plan (optional)	Y	
8-11-306	Surface Preparation and Cleanup Solvent	Y	
8-11-402	Operation and Maintenance Plan	Y	
8-11-403	Compliance Schedule	Y	
8-11-501	Coating Records	Y	
8-11-504	Afterburner Temperature, Monitoring	Y	
BAAQMD Regulation 8, Rule 11	Metal Container, Closure and Coil Coating (12/20/95)		
8-11-301.9	VOC Limit – Inks	Y	
BAAQMD Condition # 2963			
part 1	Material Usage Limits (basis: Cumulative Increase, BACT)	Y	
part 2	Material Usage Limits (basis: Cumulative Increase, BACT)	Y	
part 3	POC Emissions Limit (basis: Cumulative Increase, BACT)	Y	
part 4	Abatement Requirement (basis: Cumulative Increase, BACT)	Y	
part 5	Abatement Requirement (basis: Cumulative Increase, BACT)	Y	
part 6	Intake Flow Velocity Requirement (basis: Cumulative Increase, BACT)	Y	
part 7	Destruction Efficiency Requirement (basis: Cumulative Increase, BACT)	Y	
part 8	Minimum Temperature Requirement (basis: Cumulative	Y	

IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S-125, LITHO PRESS, LINE 7
S-126, LITHO PRESS, LINE 8
S-127, VARNISH COATER, LINE 8
S-128, OVEN, LINE 8
S-162, VARNISH COATER, LINE 7
S-163, OVEN, LINE 7

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
	Increase, BACT, Regulation 8-11-302)		
part 9	Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	
part 10	Temperature Excursion Records (basis: Regulation 2-1-403)	Y	
part 11	Temperature Excursion Definition (basis: Regulation 2-1-403)	Y	
part 12	Alternative Compliance Provision (basis: BAAQMD Regulations 8-11-301, 8-11-302 and 8-11-305)	Y	
part 13	Records, Temperature Monitoring Data (basis: BAAQMD Regulations 2-6-501 and 8-11-504)	Y	
part 14	Records, Coating and Solvent Usage	Y	
part 14 a)	coating information (basis BAAQMD Regulation 8-11-501.1)	Y	
part 14 b)	daily usage records (basis: BAAQMD Regulation 8-11-501.2)	Y	
part 14 c)	cleanup solvent information (basis BAAQMD Regulation 8-11-501.3)	Y	
part 14 d)	monthly totals of daily quantities (basis: BAAQMD Regulation 8-11-501.4)	Y	
part 14 e)	Annual usage and emissions summary (basis: BAAQMD Regulation 2-6-501)	Y	
part 15	Annual source test (basis: Cumulative Increase, BACT, Regulation 8-11-302)	Y	

IV. Source-specific Applicable Requirements

Table IV - C
Source-specific Applicable Requirements
S-164, ORGANIC LIQUID STORAGE TANK

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 5	Storage of Organic Liquids (January 20, 1993)		
8-5-301	Storage Tanks Smaller than 150 m ³	Y	
8-5-301.1	a submerged fill pipe	Y	
8-5-301.2	an apparatus of equal efficiency to 301.1	Y	
8-5-303	Above Ground Storage Tanks Larger than 37.5 m ³ and Smaller than 75 m ³	Y	
8-5-501	Records	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

VI. PERMIT CONDITIONS

Any part that is preceded by an asterisk is not federally enforceable.

Condition # 3983

FOR COATING LINES 5 AND 6

Line	Coater	Oven	afterburner
5	S-39	S-161	A-5
6	S-38	S-160	A-6

1. Emissions from each coating line shall be collected and abated by the control device shown below.

Line	Coater	Oven	Afterburner
5	S-39	S-161	A-5
6	S-38	S-160	A-6

Afterburners A-5 and A-6 shall achieve at least 98.5% destruction of VOC emissions on a mass basis, or shall maintain a maximum VOC exhaust gas concentration of 10 ppmv, carbon. (Basis: Cumulative Increase, BACT)

2. Afterburners A-5 and A-6 shall maintain the minimum temperature shown below whenever the corresponding coating line operates:

Abatement device Description	Minimum Temperature
A-5, Afterburner	1350 °F
A-6, Afterburner	1350 °F

The owner/operator may demonstrate, to the satisfaction of the APCO, that a lower incinerator temperature achieves the POC destruction efficiency required in part 1. (Basis: Cumulative Increase, BACT Regulation 8-11-302)

Facility Name: Silgan Containers Corporation
Permit for Facility #: B0631
Expiration Date: October 31, 2004
ID: KRD

VI. Permit Conditions

Condition # 3983

FOR COATING LINES 5 AND 6

3. The temperature limit in part 2 shall not apply during an “Allowable Temperature Excursion”, provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:
 - a. A temperature excursion not exceeding 20 degrees F; or
 - b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
 - c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.
 - i. the excursion does not exceed 50 degrees F;
 - ii. the duration of the excursion does not exceed 24 hours; and
 - iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12 excursion limit. (Basis: Regulation 2-1-403)
4. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
 - a. Temperature controller setpoint;
 - b. Starting date and time, and duration of each Allowable Temperature Excursion;
 - c. Measured temperature during each Allowable Temperature Excursion;
 - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
 - e. All strip charts or other temperature records. (Basis: Regulation 2-1-403)
5. For the purposes of parts 3 and 4, a temperature excursion refers only to temperatures below the limit.
6. To ensure emissions capture, the intake flow velocities at the emissions collection points for these sources shall meet or exceed 200 feet per minute, except at the oven face opening, where the intake flow velocity shall meet or exceed 100 feet per minute. The owner/operator shall measure, or have measured, the intake flow velocity at each collection point on a quarterly basis. (Basis: Cumulative Increase, BACT)

VI. Permit Conditions

Condition # 3983

FOR COATING LINES 5 AND 6

7. The temperature and intake flow velocity data collected pursuant to parts 2 and 6 shall be recorded and maintained for 60 months following the date on which the record was made. These records shall be made available to the District upon site inspection or request. (Basis: Regulation 8-11-504 and 2-6-501)
8. These sources shall apply coatings complying with the limits of Regulation 8-11-301, comply with the abatement requirements of 8-11-302, or comply with the alternative emission control requirements of 8-11-305. (Basis: Regulations 8-11-301, 8-11-302 and 8-11-305)
9. To demonstrate compliance with Regulation 8-11-301 or 8-11-302, the following records shall be kept on site and made available for District inspection for a period of 60 months from the date on which the record was made.
 - a) A current list of coatings in use which provides all coating data necessary to evaluate compliance. (Basis: Regulation 8-11-501.1)
 - b) The type and amount of each coating used on a daily basis. (Basis: Regulation 8-11-501.2)
 - c) The type and amount of solvent used for surface preparation and cleanup on a monthly basis. (Basis: Regulation 8-11-501.3)
 - d) Monthly summaries of the daily coating records maintained under a). (Basis: Regulation 8-11-501.4)
 - e) A material usage and emissions summary shall be submitted annually, and shall be received by the District no later than the permit renewal date, September 1. The summary shall detail the type, VOC content, and amount of all coatings and surface preparation solvents used. (Basis: Regulation 2-6-501).
10. To demonstrate compliance with part 1, the owner/operator shall conduct an annual source test. This source test shall be conducted in accordance with the District's Manual of Procedures, Volume IV, Method ST-7. (Basis: Cumulative Increase, BACT)

VI. Permit Conditions

Condition # 2963

FOR LITHO LINES 7 AND 8

Line	Litho Press	Coater	Oven	Afterburner
#7	S-125	S-162	S-163	A-7
#8	S-127	S-127	S-128	A-8

1. The following annual material usage limits apply to Litho Presses S-125 and S-126 and shall not be exceeded during any consecutive 365 day period: (Basis: Cumulative Increase, BACT)

Material	Usage
Ink	7800 gal/yr (72,860 lb/yr)
IPA (fountain solution)	4500 gal/yr

2. The following annual combined material usage limits apply to Varnishers S-127 and S-162 and shall not be exceeded during any consecutive 365 day period: (Basis: Cumulative Increase, BACT)

Material	Usage
Overvarnish	35,000 gal/yr
Clean-up Solvent	1500 gal/yr

3. Total annual controlled precursor organic compound emissions from Litho Lines #7 and #8, as described above, shall not exceed 34.0 tons per year. (Basis: Cumulative Increase, BACT)
4. POC emissions from Litho Oven S-163 (Line 7) shall be controlled by A-7 during all periods of operation when the litho press and overvarnish machines are running coatings containing POC and during all periods when such coated sheets are dried in the oven. (Basis: Regulation 8-11-302, Cumulative Increase, BACT)
5. POC emissions from Litho Oven S-128 (Line #8) shall be controlled by A-8 during all periods of operation when the litho press and overvarnish machines are running coatings containing POC and during all periods when such coated sheets are dried in the oven. (Basis: Regulation 8-11-302, Cumulative Increase, BACT)
6. To ensure emissions capture, the intake flow velocities at the emissions collection points for these sources shall meet or exceed 200 feet per minute, except at the oven face opening, where the intake flow velocity shall meet or exceed 100 feet per minute. The owner/operator shall measure, or have measured, the intake flow velocity at each collection point on a quarterly basis. (Basis: Cumulative Increase, BACT)

VI. Permit Conditions

Condition # 2963

FOR LITHO LINES 7 AND 8

7. Afterburners A-7 and A-8 required in parts 4 and 5 shall achieve a minimum destruction efficiency of 97.5% on a mass basis, or shall maintain less than 10 ppmv carbon in the exhaust gas stream. (Basis: Cumulative Increase, BACT)
8. Afterburners A-7 and A-8 shall maintain a minimum temperature of 1350 degrees Fahrenheit whenever the litho press and overvarnish machines are running coatings containing POC and during all periods when such coated sheets are dried in the oven. The owner/operator may demonstrate, to the satisfaction of the APCO, that a lower incinerator temperature achieves the required POC destruction efficiency required in part 7. (Basis: Cumulative Increase, BACT, Regulation 8-32-302)
9. The temperature limit in part 8 shall not apply during an "Allowable Temperature Excursion", provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:
 - a. A temperature excursion not exceeding 20 degrees F; or
 - b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
 - c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.
 - i. the excursion does not exceed 50 degrees F;
 - ii. the duration of the excursion does not exceed 24 hours; and
 - iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12 excursion limit. (Basis: Regulation 2-1-403)
10. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
 - a. Temperature controller setpoint;
 - b. Starting date and time, and duration of each Allowable Temperature Excursion;
 - c. Measured temperature during each Allowable Temperature Excursion;
 - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and

VI. Permit Conditions

- e. All strip charts or other temperature records. (Basis: Regulation 2-1-403)

Condition # 2963

FOR LITHO LINES 7 AND 8

11. For the purposes of parts 9 and 10, a temperature excursion refers only to temperatures below the limit.
12. These sources shall apply coatings complying with the limits of Regulation 8-11-301, comply with the abatement requirements of 8-11-302, or comply with the alternative emission control requirements of 8-11-305. (Basis: Regulations 8-11-301, 8-11-302 and 8-11-305)
13. Temperature monitoring data for A-7 and A-8, and the intake flow velocity data, shall be recorded and maintained for 60 months following the date on which the record was made. These records shall be made available to the District upon site inspection or request. (Basis: Regulations 8-11-504 and 2-6-501)
14. To demonstrate compliance with parts 1, 2 and 3 and Regulation 8-32-301, the following records shall be kept on site and made available for District inspection for a period of 60 months from the date on which the record was made.
 - a) A current list of coatings in use which provides all coating data necessary to evaluate compliance. (Basis: Regulation 8-11-501.1)
 - b) The type and amount of each coating used on a daily basis. (Basis: Regulation 8-11-501.2)
 - c) The type and amount of solvent used for surface preparation and cleanup on a monthly basis. (Basis: Regulation 8-11-501.3)
 - d) Monthly summaries of the daily coating records maintained under a). (Basis: Regulation 8-11-501.4)
 - e) A material usage and emissions summary shall be submitted annually, and shall be received by the District no later than the permit renewal date, September 1. The summary shall detail the type, VOC content, and amount of all coatings used. (Basis: Regulation 2-6-501)
15. To demonstrate compliance with part 7, the owner/operator shall conduct an annual source test. This source test shall be conducted in accordance with the District's Manual of Procedures, Volume IV, Method ST-7. (Basis: Cumulative Increase, BACT)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-38, COATER, LINE 2
S-39, COATER, LINE 3
S-160, COATER OVEN, LINE 2
S-161, COATER OVEN, LINE 3

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQMD 8-11-301.1	Y		sheet basecoat: 225 grams VOC per liter, as applied, excluding water	BAAQMD 8-11-501.1	P/D	Coating records
POC	BAAQMD 8-11-302	Y		Emission Control Device Limitation, $\geq 90\%$	BAAQMD Condition #3983, part 10	P/A	source test
POC	BAAQMD 8-11-305.1 (optional)	Y		Daily weighted average VOC emissions from all coatings equivalent to VOC limits specified by 8-11-301	BAAQMD 8-11-305.3 – 8-11-503.1	P/A – P/E	Alternative Emission Control Plan submittal – Excess emissions reporting

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-38, COATER, LINE 2
S-39, COATER, LINE 3
S-160, COATER OVEN, LINE 2
S-161, COATER OVEN, LINE 3

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQM D Condition #3983 part 1			destruction efficiency $\geq 98.5\%$ wt or < 10 ppmv at exhaust	BAAQMD Condition #3983 part 10	P/A	source test
POC	BAAQM D Condition #3983 part 2			minimum temperature requirement: 1350 °F	BAAQMD 8-11-504 and BAAQMD Condition #3983 parts 3, 4, 5 and 7	C	temperature recorder
POC	BAAQM D Condition #3983 part 6			Intake flow velocity requirement, ≥ 200 fpm at the collection points, except at the oven face opening where the requirement is ≥ 100 fpm	BAAQMD 8-11-504 and BAAQMD Condition #3983 part 6	P/Quarterly	Measurement

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-125, LITHO PRESS, LINE 7, S-126, LITHO PRESS, LINE 8
S-127, VARNISH COATER, LINE 8, S-128, OVEN, LINE 8
S-162, VARNISH COATER, LINE 7, S-163, OVEN, LINE 7

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQM D 8-11-301.1	Y		sheet basecoat: 225 grams VOC per liter, as applied, excluding water	BAAQMD 8-11-501.1	P/D	Coating records
POC	BAAQM D 8-11-301.10	N		inks: 300 grams VOC per liter, as applied, excluding water	BAAQMD 8-11-501.1	P/D	Coating records
POC	BAAQM D 8-11-302	Y		Emission Control Device Limitation, >= 90%	BAAQMD Condition #2963 part 15	P/A	source test
POC	BAAQM D 8-11-305.1 (optional)	Y		Daily weighted average VOC emissions from all coatings equivalent to VOC limits specified by 8-11-301	BAAQMD 8-11-305.3 – 8-11-503.1	P/A – P/E	Alternative Emission Control Plan submittal – Excess emissions reporting
	SIP 8-11-301.9	Y		inks: 300 grams VOC per liter, as applied, excluding water	BAAQMD 8-11-501.1	P/D	Coating records
POC	BAAQM D Condition #2963 part 1	Y		ink 7800 gal/yr; IPA 4500 gal/yr	BAAQMD Condition #2963 parts 14a, 14b, 14c, 14d & 14e	P/D/M/A	daily records totaled monthly and annually

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-125, LITHO PRESS, LINE 7, S-126, LITHO PRESS, LINE 8
S-127, VARNISH COATER, LINE 8, S-128, OVEN, LINE 8
S-162, VARNISH COATER, LINE 7, S-163, OVEN, LINE 7

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQM D Condition #2963 Part 2	Y		Overvarnish 35,000 gal/yr; Cleanup Solvent 1500 gal/yr	BAAQMD Condition #2963 parts 14a, 14b, 14c, 14d & 14e	P/D/M/A	daily records totaled monthly and annually
POC	BAAQM D Condition #2963 part 3	Y		Annual emissions limit ≤ 34.0 tpy	BAAQMD Condition #2963 part 14e	P/A	annual emissions report
POC	BAAQM D Condition #2963 part 4	Y		Abatement requirement	BAAQMD Condition #2963 part 13	C	temperature recorder
POC	BAAQM D Condition #2963 part 5	Y		Abatement requirement	BAAQMD Condition #2963 part 13	C	temperature recorder
POC	BAAQM D Condition #2963 part 6	Y		Intake flow velocity requirement, ≥ 200 fpm at the collection points, except at the oven face opening where the requirement is ≥ 100 fpm	Condition #2963 part 6	P/Quarterly	measurement

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-125, LITHO PRESS, LINE 7, S-126, LITHO PRESS, LINE 8
S-127, VARNISH COATER, LINE 8, S-128, OVEN, LINE 8
S-162, VARNISH COATER, LINE 7, S-163, OVEN, LINE 7

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQMD Condition #2963 part 7	Y		destruction efficiency $\geq 97.5\%$ wt or < 10 ppmv at exhaust	BAAQMD Condition #2963 part 15	P/A	source test
POC	BAAQMD Condition #2963 part 8			minimum temperature requirement 1350 °F	BAAQMD 8-11-504 and BAAQMD Condition #2963 part 13	C	temperature recorder

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 8-11-301.1	Basecoat / Overvarnish VOC Limit	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products
BAAQMD 8-11-301.10	Ink VOC Limit	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products
BAAQMD 8-11-302	Emission Control Device Limitation	Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" or 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"
SIP 8-11-301.9	Ink VOC Limit	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products
BAAQMD Cond. #2963, part 7	Incinerator Abatement Control Efficiency	Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" or 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"

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Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD Cond. #3983, part 1	Incinerator Abatement Control Efficiency	Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" or 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"

IX. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

IX. Glossary

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

IX. Glossary

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

IX. Glossary

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

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X. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments